

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

CENTRAL SOURCE LLC,

Plaintiff,

v.

annalcreditreport.co,  
annualcreditreport-transunion.com,  
wwwannualcreditreport.com,  
annualcreditreporeport.com,  
annualcreditreportg.com, and  
getfreeannualcreditreport.com

Defendants.

Civil Action No. 1:18-cv-01316-AJT-MSN

**PLAINTIFF'S REQUEST FOR CLERK'S ENTRY OF DEFAULT**

Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiff Central Source LLC ("Central Source"), by counsel, requests that the Clerk of the Court enter default against the Internet domain names annalcreditreport.co, annualcreditreport-transunion.com, wwwannualcreditreport.com, annualcreditreporeport.com, annualcreditreportg.com, and getfreeannualcreditreport.com (the "Domain Names") for failure to defend the lawsuit. In support of this request, Central Source states as follows:

1. Central Source filed its Complaint ("Complaint") against Defendant Domain Names on October 19, 2018, *see* ECF No. 1, and its First Amended Complaint ("FAC") on February 5, 2019, *see* ECF No. 4.

2. annalcreditreport.co is an Internet domain name which, according to records in the whois database of domain name registrations, is registered by an unidentified individual in

that the registrant field of the public whois record for the domain name is blank. FAC ¶ 6 & Ex. 1.

3. annualcreditreport-transunion.com is an Internet domain name which, according to records in the whois database of domain name registrations, is registered by “Data Protected Data Protected”. FAC ¶ 7 & Ex. 2.

4. wwwannualcreditreport.com is an Internet domain name which, according to records in the whois database of domain name registrations, is registered by “Domain Administrator”. FAC ¶ 8 & Ex. 3.

5. annualcreditreporeport.com is an Internet domain name which, according to records in the whois database of domain name registrations, is registered by “Domain Administrator”. FAC ¶ 9 & Ex. 4.

6. annualcreditreportg.com is an Internet domain name which, according to records in the whois database of domain name registrations, is registered by “NAM JONG KANG”. FAC ¶ 10 & Ex. 5.

7. getfreeannualcreditreport.com is an Internet domain name which, according to records in the whois database of domain name registrations, is registered by “Registration Private”. FAC ¶ 11 & Ex. 6.

8. On February 5, 2019, Central Source provided the registered owner(s) of the Defendant Domain Names with notice of the alleged violations and a copy of the Complaint. *See* First Declaration of Ari Meltzer (ECF No. 6-1) ¶ 6 & Attach. 1. The notice was sent to the postal and e-mail addresses provided in the domain name registration records for the Domain Names. *Id.*

9. On February 8, 2019, Central Source filed a Motion for Service By Publication. *See* ECF Nos. 5-7. On February 8, 2019, the Court granted Central Source's Motion and ordered Central Source to publish the Order providing notice to the Defendants in *The Washington Post* or *The Washington Time* once within fourteen (14) days after the entry of the Order. *See* ECF No. 8. The Order further directed Central Source to file a declaration within twenty (20) days after the entry of the Order describing the steps that Central Source had taken to comply with the Order. *Id.*

10. Central Source caused the Order of Service By Publication to be published in *The Washington Times* on February 13, 2019. *See* Second Declaration of Ari Meltzer (ECF No. 9). Central Source filed its declaration describing compliance with the Order on February 21, 2019. *Id.*

11. In accordance with the Order of Service By Publication, Defendants' answer(s) or other response(s) were due no later than March 6, 2019. No such answer or other response has been filed or served.

WHEREFORE, for the reasons set forth above, Central Source respectfully requests that the Clerk enter default against the Defendants as to all claims asserted by Central Source.

Dated: May 13, 2019

By: /s/ Attison L. Barnes, III /s/  
Attison L. Barnes, III (VA Bar No. 30458)  
WILEY REIN LLP  
1776 K St. NW  
Washington, DC 20006  
(202) 719-7000 (phone)  
(202) 719-7049 (fax)  
abarnes@wileyrein.com  
dweslow@wileyrein.com

*Counsel for Central Source LLC*

**CERTIFICATE OF SERVICE**

I, Attison L. Barnes, III, hereby certify that on May 13, 2019, I electronically filed the foregoing by using the CM/ECF system. I also sent copies to the registrant of the domain names at the postal and email addresses provided by the registrant to the registrar of the annalcreditreport.co, annualcreditreport-transunion.com, wwwannualcreditreport.com, annualcreditreporeport.com, annualcreditreportg.com, and getfreeannualcreditreport.com domain names:

annalcreditreport.co  
No postal or email address provided

annualcreditreport-transunion.com  
Data Protected Data Protected  
Data Protected  
123 Data Protected, Toronto ON M6K 3M1 CA  
noreply@data-protected.net

wwwannualcreditreport.com  
Domain Administrator  
See PrivacyGuardian.org  
1928 E. Highland Ave. Ste F104 PMB# 255  
Phoenix AZ 85016 US  
pw-84c9040b8d113941a6bd7aade25ae0d1@privacyguardian.org

annualcreditreporeport.com  
Domain Administrator  
See PrivacyGuardian.org  
1928 E. Highland Ave. Ste F104 PMB# 255  
Phoenix AZ 85016 US  
pw-6841e801c92e7623249481179ea332ff@privacyguardian.org

annualcreditreportg.com  
NAM JONG KANG  
902, HAKSEONG-DONG  
WONJU-SI SOUTH KOREA 220-963 KR  
K8993B@GMAIL.COM

getfreeannualcreditreport.com  
Registration Private  
Domains By Proxy, LLC  
Scottsdale, AZ 85260  
getfreeannualcreditreport.com@domainsbyproxy.com

/s/ Attison L. Barnes, III /s/

---

Attison L. Barnes, III, Esq.

WILEY REIN LLP

1776 K Street, NW

Washington, DC 20006

Tel: (202) 719-7000

Fax: (202) 719-7049

abarnes@wileyrein.com

*Counsel for Plaintiff Central Source LLC*